

**Christy L. Zerges**

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**From:** Michael Roberts [mroberts@Graydon.com]  
**Sent:** Thursday, April 29, 2004 3:29 PM  
**To:** Christy L. Zerges; Peter M. Burrell; William R. Ellis  
**Cc:** Michael Roberts  
**Subject:** Re: Kearney Depositions

Bill

I understand that Miller will not be agreeable to a depo unless he receives the full \$2,100.

Lets do the 6/7 in North Carolina. When you purchase my ticket set me up with the first flight out on the 6th. We can begin the first depo 90 minutes after I arrive at the airport (what town is it?).

Please make my return in the late afternoon or early evening of the 7th.

Arrange for the same type of schedule for the following week's trip to Hartford/Springfield. Mike

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>>> "William R. Ellis" <WREllis@WoodLamping.com> 04/29/04 11:51AM >>>  
Mr. Roberts, I have been advised that Valerie Lofton, who would be the 30 (b) (6) witness for Jefferson Pilot cannot be available after the 10th due to out of state speaking engagements and prior business commitments. She does remain available for the 6th or 7th. Given that I am pretty close to confirming the availability of all of the DMS people for Springfield on the 13th and 14th and the fact that we have the plaintiff here on the 10th, I see no real option for the Jefferson Pilot people, other than the 6th and 7th within the time allotted by the court at your request. Please advise so that I can purchase your airline tickets and hotel room.

William R. Ellis